

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RECLAIM THE RECORDS,
ALEC FERRETTI, ALEX CALZARETH,
and RICH VENEZIA

Plaintiffs,

- against -

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES,

Defendant.

NOTICE OF CROSS MOTION

No. 23-CV-1997 (PAE)

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Opposition to Defendant's Motion to Dismiss, for Summary Judgment, or for Severance, and in Support of Plaintiffs' Cross-Motion for Summary Judgment, the October 4, 2024 Declaration by Benjamin Meyers, and the October 4, 2024 Declaration by Alex Calzareth, Plaintiffs, by their attorneys Beldock Levine & Hoffman, LLP, hereby moves this Court for an order granting summary judgment for the Plaintiffs pursuant to Rule 56 of the Federal Rules of Civil Procedure and denying Defendant's motions to dismiss, for summary judgment, or for severance, declaring the Defendant has a policy and practice of violating the Freedom of Information Act ("FOIA") through their excessive delays in responding to FOIA requests, ordering Defendant to promptly provide the requested documents, and issuing any other such relief as the Court deems appropriate.

Dated: October 4, 2024
New York, New York

Respectfully submitted,

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By: _____

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